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*Attorneys for Plaintiff Keyssa, Inc.*

*Attorneys for Defendant  
 Essential Products, Inc.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION**

KEYSSA, INC.,

Plaintiff,

vs.

ESSENTIAL PRODUCTS, INC.,

Defendant.

CASE NO. 4:17-cv-05908-HSG

**JOINT STIPULATION AND  
 [PROPOSED] ORDER REGARDING  
 KEYSSA, INC.'S SERVICE OF TRADE  
 SECRET DISCLOSURES AFTER ENTRY  
 OF A PROTECTIVE ORDER**

**Jury Trial Demanded**

Pursuant to Civil Local Rules 6-2, Plaintiff Keyssa, Inc. ("Keyssa") and Defendant Essential Products, Inc. ("Essential") (collectively, the "Parties"), by and through their respective counsel of record, hereby stipulate as follows:

**WHEREAS**, pursuant to the Court's February 5, 2019 Amended Scheduling Order (Dkt. No. 46), Keyssa is required to serve its Trade Secret Disclosures no later than March 8, 2019;

**WHEREAS** the parties have yet to reach final agreement on the scope of a proposed Protective Order in this matter, and therefore no Protective Order has yet been entered by this Court;

**WHEREAS** the parties expect to file a stipulated, proposed Protective Order on March 6, 2019;

1       **WHEREAS** good cause exists for Keyssa to refrain from serving its Trade Secret Disclosures  
2 until after the entry of a Protective Order because, by necessity, Keyssa's Trade Secret Disclosures  
3 will contain Keyssa's confidential, trade secret information, Keyssa would be harmed by unrestricted  
4 disclosure of its confidential trade secret information, and such an Order shall govern the process for  
5 serving and handling confidential information in this case;

6       **WHEREAS** this Stipulation is accompanied by the concurrently-filed Declaration of Sam  
7 Stake in Support of the Joint Stipulation and [Proposed] Order Regarding Keyssa, Inc.'s Service of  
8 Trade Secret Disclosures After Entry of a Protective Order;

9       **NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE THAT** the  
10 March 8, 2019 deadline for Keyssa to serve its Trade Secret Disclosures pursuant to California Code  
11 Civ. Proc. § 2019.210 be vacated. Keyssa shall not serve its Trade Secret Disclosures upon Essential  
12 until such time that the Court enters a Protective Order governing the service and handling of  
13 confidential information in this matter. Keyssa shall serve its Trade Secret Disclosures upon Essential  
14 immediately upon entry of such a Protective Order, and in no event later than within one (1) day  
15 following the entry of such an order.

16       **IT IS SO STIPULATED.**

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18                               *\* \* \* Signatures on following page. \* \* \**  
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1 Dated: March 6, 2019

Respectfully submitted,

2 QUINN EMANUEL URQUHART & SULLIVAN, LLP

3  
4 By: /s/ Daid Eiseman

5 David Eiseman  
6 Charlie K. Verhoeven  
7 Sam Stake

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*Attorneys for Plaintiff Keyssa, Inc.*

18 Dated: March 6, 2019

Respectfully submitted,

19 KEKER, VAN NEST & PETERS LLP

20  
21 By: /s/ Ryan K. Wong

22 Robert A. Van Nest  
23 Leo L. Lam  
24 Daniel Purcell  
25 Matthew M. Werdegarr  
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*Attorneys for Defendant Essential Products, Inc.*

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2 **ATTESTATION**

3 Pursuant to Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose

4 behalf this filing is submitted, concur in the filing's content and have authorized the filing.

5 Dated: March 6, 2019

/s/ David Eiseman

6 David Eiseman

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10 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED** the March 8, 2019 deadline

11 for Keyssa to serve its Trade Secrets Disclosures pursuant to California Code Civ. Proc. § 2019.210 is

12 hereby vacated. Keyssa shall not serve its Trade Secret Disclosures upon Essential until such time

13 that the Court enters a Protective Order governing the service and handling of confidential information

14 in this matter. Keyssa shall serve its Trade Secret Disclosures upon Essential immediately upon entry

15 of such a Protective Order, and in no event later than within one (1) day following the entry of such an

16 order.

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19 Dated: \_\_\_\_\_, 2019

HAYWOOD S. GILLIAM, JR.

20 United States District Judge

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